

SA:LKG

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

- against -

DIEGO MARADONA HYLTON,

Defendant.

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EASTERN DISTRICT OF NEW YORK, SS:

ROSANNA LICITRA, being duly sworn, deposes and states that she is a Special Agent with the United States Department of Homeland Security, Homeland Security Investigations, duly appointed according to law and acting as such.

On or about August 9, 2015, within the Eastern District of New York and elsewhere, the defendant DIEGO MARADONA HYLTON did knowingly, intentionally and unlawfully import into the United States from a place outside thereof a substance containing cocaine, a Schedule II controlled substance.

(Title 21, United States Code, Section 952(a) and 960)

The source of your deponent's information and the grounds for her belief are as follows:¹

1. I am a Special Agent with the United States Department of Homeland Security, Homeland Security Investigations ("HSI") and have been involved in the

¹ Because the purpose of this Complaint is to set forth only those facts necessary to establish probable cause to arrest, I have not described all the relevant facts and circumstances of which I am aware.

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PRE-ARRAIGNMENT
COMPLAINT

(21 U.S.C. §§ 952(a) and 960)

investigation of cases involving the importation of narcotics, including cocaine, into the United States. I am familiar with the facts and circumstances based upon my review of the investigative file and from reports of other law enforcement officers involved in the investigation.

2. On the afternoon of August 9, 2015, the defendant DIEGO MARADONA HYLTON arrived at John F. Kennedy International Airport ("JFK") in Queens, New York, aboard JetBlue Flight number 960 from Kingston, Jamaica.

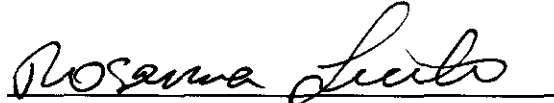
3. Customs and Border Protection ("CBP") officers approached the defendant for a border enforcement examination. The defendant presented a suitcase for inspection. During the examination, the defendant appeared visibly nervous. A baggage examination was completed with negative results.

4. The defendant was escorted to a private search room and a pat-down search was completed, again with negative results. After further questioning by CBP officers, the defendant admitted, in sum and substance and in part, that he had swallowed pellets of cocaine. An x-ray of the defendant's intestinal tract confirmed the presence of foreign bodies inside of the defendant.

5. The defendant was subsequently transported to the JFK medical facility. Thereafter, the defendant passed 8 pellets. One of the pellets contained a white, powdery substance, which field-tested positive for the presence of cocaine.

6. The defendant will be detained at the JFK medical facility until such time as he has passed all the pellets contained within his intestinal tract. As of the morning of August 10, 2015, the defendant has passed approximately 54 pellets.

WHEREFORE, your deponent respectfully requests that the defendant DIEGO MARADONA HYLTON be dealt with according to law.

A handwritten signature in dark ink, appearing to read "Rosanna Licitra", is written over a horizontal line.

ROSANNA LICITRA

Special Agent

United States Department of Homeland Security,
Homeland Security Investigations

Sworn to before me this
10th day of August, 2015

THE HONORABLE LOIS BLOOM
UNITED STATES MAGISTRATE JUDGE
EASTERN DISTRICT OF NEW YORK